

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE JPMORGAN CHASE & CO.
SECURITIES LITIGATION

CASE No.: 1:20-cv-05124-ENV-RML

STIPULATION AND [PROPOSED] ORDER:

- (1) ACCEPTING SERVICE AND
(2) AGREEING TO SCHEDULE FOR CONSOLIDATED
AMENDED COMPLAINT AND RESPONSE THERETO**

WHEREAS, the securities class action titled *Mehta v. JPMorgan Chase & Co., et al.*, 1:20-cv-05124-ENV-RML (E.D.N.Y.) (“*Mehta Action*”) was commenced on October 24, 2020 on behalf of investors that purchased or otherwise acquired the securities of JPMorgan Chase & Co. (“JPMorgan” or the “Company”) from February 23, 2016 through September 23, 2020, both dates inclusive (the “Class Period”);

WHEREAS, the provisions of the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4 *et seq.* govern the *Mehta Action* and the related, subsequently filed action, *Lobevero v. JPMorgan Chase & Co., et al.*, 1:20-cv-05590-EK-RER (E.D.N.Y.) (“*Lobevero Action*” and with the *Mehta Action*, “Consolidated Actions”);

WHEREAS, The Rosen Law Firm, P.A., counsel to plaintiff in the *Mehta Action*, had communicated with counsel for Defendants with regard to waiver of service in the *Mehta Action*;

WHEREAS, by Order dated January 23, 2021, this Court granted movants’ motion (ECF No. 13) to consolidate the *Mehta Action* with the *Lobevero Action*, to create a new caption for these Consolidated Actions, *In re JPMorgan Chase & Co Securities Litigation*, Master File No. 1:20-cv-05124-ENV-RML, to appoint Co-Lead Plaintiffs, and to approve their selection of Co-Lead Counsel;

WHEREAS, Co-Lead Counsel have met and conferred with counsel for Defendants with respect to waiver of service under Fed. R. Civ. P. 4(d) for all Defendants and a schedule for the filing of and response to Co-Lead Plaintiffs’ consolidated amended complaint; and

WHEREAS, in light of the foregoing, the parties agree that to achieve efficiency for the Court and the parties in proceeding under the PSLRA, Defendants should not answer or otherwise respond to the complaints in either the *Mehta Action* or the *Lobevero Action*;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the respective parties hereto, that:

1. Pursuant to Fed. R. Civ. P. 4(d), Defendants waive service of process and any right to seek dismissal for insufficient process under Fed. R. Civ. P. 12(b)(4) or insufficient service of process under Fed. R. Civ. P. 12(b)(5). Defendants, however, do not waive and expressly retain all other rights and defenses in these Consolidated Actions.

2. Defendants shall not be required to answer or otherwise respond to either initial complaint in the *Mehta* Action or the *Lobevero* Action.

3. Co-Lead Plaintiffs will file their consolidated amended complaint on or before March 24, 2021.

4. Defendants shall answer or move to dismiss Co-Lead Plaintiffs' consolidated amended complaint on or before May 25, 2021.

5. If Defendants move to dismiss Co-Lead Plaintiffs' consolidated amended complaint, Co-Lead Plaintiffs will file their opposition to that motion on or before July 9, 2021 and Defendants shall file a reply in further support of their motion to dismiss on or before August 10, 2021.

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SO STIPULATED, this 29th day of January 2021:

<p>SULLIVAN & CROMWELL LLP</p> <p><u>/s/ Robert A. Sacks</u> Robert A. Sacks Amanda F. Davidoff SULLIVAN & CROMWELL LLP 125 Broad Street New York, New York 10004 Telephone: (212) 558-4000 Email: sacksr@sullcrom.com Email: davidoffa@sullcrom.com</p> <p><i>Counsel for Defendants JPMorgan Chase & Co., James Dimon, Jennifer Piepszak, and Marianne Lake</i></p>	<p>ROBBINS GELLER RUDMAN & DOWD LLP</p> <p><u>/s/ Michael Capeci</u> Samuel H. Rudman David A. Rosenfeld Michael Capeci 58 South Service Road, Suite 200 Melville, NY 11747 Telephone: 631/367-7100 631/367-1173 (fax) Email: srudman@rgrdlaw.com Email: drosenfeld@rgrdlaw.com Email: mcapaci@rgrdlaw.com</p> <p>THE ROSEN LAW FIRM, P.A.</p> <p><u>/s/ Jacob A. Goldberg</u> Philip Kim Jacob A. Goldberg Leah Heifetz-Li 101 Greenwood Avenue, Suite 440 Jenkintown, PA 19046 Tel.: (215) 600-2817 Fax: (212) 202-3827 Email: pkim@rosenlegal.com Email: jgoldberg@rosenlegal.com Email: lheifetz@rosenlegal.com</p> <p><i>Co-Lead Counsel for Lead Plaintiffs Julius Papas, the City of Ann Arbor Employees' Retirement System and Richard Lobevero</i></p>
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SO ORDERED:

This ____ day of _____, 2021

THE HONORABLE ROBERT M. LEVY
UNITED STATES MAGISTRATE JUDGE